



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, ILLINOIS 60604

Reply to the Attention Of: SR-6J

February 26, 2009

EPA Region 5 Records Ctr.



312168

Via E-mail and Certified Mail

Steve Weisher
LyondellBasell Industries
One Houston Center, Suite 700
1221 McKinney Street
Houston, TX 77010

RE: Supplemental Groundwater Evaluation Work Plan
12th Street Landfill, Kalamazoo River Superfund Site Operable Unit #04
Plainwell, Michigan

Dear Mr. Weisher:

The United States Environmental Protection Agency (EPA) has reviewed Arcadis' December 29, 2008 Draft Groundwater Evaluation Workplan (GEWP) for *Allied Landfill, Kalamazoo River Superfund Site Operable Unit #01, Kalamazoo, Michigan*. EPA has both general and specific comments on the GEWP. At this point in time, EPA does not approve the GEWP. Please address the following comments in the next draft of the GEWP.

General Comments:

- 1) Additional documentation will need to be provided in the groundwater investigation report to support the conclusions drawn in the evaluation and summarized in bulleted form on pages 1 and 2. Supporting information may include presentation of the data, development of cross sections, and potentiometric surface maps.
- 2) A key issue identified by the City of Kalamazoo is the potential for a downward gradient from the surficial aquifer to the lower regional aquifer. This issue is based on the City's evaluation of wells MW-122A, MW-122B and MW-212. These wells are currently not included in the overall evaluation. This may be perceived as selectively ignoring these wells as the City believes was done during the RI.
- 3) Water levels should be measured from all onsite wells. This will allow a more detailed evaluation when combined with the offsite wells at the Strebtor properties as well as historical comparisons. This is especially important to evaluate the intermediate and deep transmissive zones in the surficial aquifer.
- 4) Flow direction in the regional aquifer should be characterized to determine if the site is up gradient to the municipal well field. Additional regional aquifer wells should

be included in the investigation if available. If existing regional aquifer wells cannot be located, new wells may be required.

- 5) We suggest a phased approach for investigating groundwater at the site. Collecting water levels first and analyzing the data. Follow up sampling for contaminants would occur, if needed, in a second phase.

Specific Comments:

- 1) Page 2/10, first paragraph: *The groundwater investigation and data evaluation should be performed prior to the finalization of the Feasibility Study.* Work on the groundwater investigation and the Feasibility Study should be performed concurrently to avoid schedule delays.
- 2) Page 8/10, Sampling Locations, Methods and Procedures: Have any steps been taken to assess the current condition of the Strebor wells? This activity should be conducted as soon as possible to avoid delays if problems are identified.
- 3) Page 9/10, Sampling Locations, Methods and Procedures: Why aren't MW-122A & B and MW-212 wells being monitored since the questions have arisen from gradients observed at these wells?
- 4) Page 9/10, Sampling Locations, Methods and Procedures: Are there additional regional aquifer wells installed onsite or near the site (other than the Strebor wells) that can be used to evaluate groundwater flow and/or quality from the site? With the proposed PCB analysis in the Strebor wells and other analyses recommended in the Brant Fisher memorandum, is there sufficient data to determine if any potential detections are site related?
- 5) Page 9/10, Groundwater Analysis: Only the Strebor wells are proposed for groundwater analyses. How will this data be compared to historic analytical data for evaluation?
- 6) Page 9/10, Evaluation and Reporting: "MHLLC agrees to work with USEPA, MDEQ, the City, and other stakeholders". The City is a stakeholder, but their role in the process needs to be clear to avoid future misunderstandings or false expectations.

If you have any questions about these comments, please contact me at (312) 353-8983.

Sincerely,



Michael Berkoff
Remedial Project Manager

cc: J.Saric EPA
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